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March 17, 2025

*Via ECF*

Hon. Kenneth M. Karas  
United States District Judge  
United States District Court for the  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re:** Fecteau v. City of Mount Vernon, et al, Docket No. 23-CV-9173(KMK) (JCM)

Dear Judge Karas:

The Quinn Law Firm represents defendants City of Mount Vernon, Commissioner Patrick Holder, Commissioner David Gibson, Sergeant Mario Stewart, Det. Montika Jones and Ms. Dawnette McLaren-Nelson (the "City Defendants") in the above-captioned action. We are preparing, and will be filing later today, a response to plaintiff pro se Mathew Fecteau's motion, pursuant to Rule 72 of the Federal Rules of Civil Procedure, wherein Plaintiff appeals from certain rulings made by Magistrate Judge Judith C. McCarthy at a conference held in this action on February 21, 2025.

We are writing now pursuant to Section IX(A) of Your Honor's Individual Practice Rule to request permission to file the City Defendants' opposition and all but one of the exhibits referenced therein under seal. A description of the exhibits to be filed under seal follows.

Ex.	Document
B	Foil Request (01-24-24)
C	Email (03-19-24)
D	Foil Request (03-03-24)
E	Email (03-24-24)
F	Email (04-01-24)
G	Email (04-02-24)
H	Email (04-14-24)
I	Email (04-29-24)
J	Foil Request (05-06-24)

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Ex.	Document
K	Email (05-08-24)
L	Email (05-14-24)
M	Email (05-15-24)
N	Email (05-16-24)
O	Letter (05-30-24)
P	Email (06-03-24)
Q	Foil Request (06-05-24)
R	Email (06-07-24)
S	Foil Request (06-07-24)
T	Postcards (06-17-24)
U	Email (06-30-24)
V	Email (07-08-24)
W	Foil Request (07-09-24)
X	Postcard (07-12-24)
Y	Postcard (07-15-24)
Z	Postcard (07-16-24)
AA	Email (07-20-24)
BB	Email (08-05-24)
CC	Email (08-06-24)
DD	Postcard (08-06-24)
EE	Email (08-09-24)
FF	Foil Request (08-11-24)
GG	Email (08-14-24)
HH	Email (08-20-24)
II	Postcard (08-20-24)
JJ	Email (09-03-24)
KK	Email (09-09-24)
LL	Email (09-09-24)
MM	Email (09-16-24)
NN	Postcard (09-18-24)



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Ex.	Document
OO	Email (09-19-24)
PP	Email (10-04-24)
QQ	Email (10-11-24)
RR	Email (11-11-24)
SS	Email (11-25-24)
TT	Email (11-26-24)
UU	Email (11-26-24_
VV	Email (12-06-24)
WW	Email (12-12-24)
XX	Email (12-18-24)
YY	Email (12-21-24)
ZZ	Email (01-03-25)
AAA	Email (01-06-25)
BBB	Email (01-08-25)
CCC	Email (01-11-25)
DDD	Email (01-23-25)
EEE	Email (02-16-25)
FFF	Email (02-20-25)
GGG	Postcard (02-27-25)
HHH	Email (03-06-25)
III	Email (03-10-25)

We are seeking permission to file the opposition, and the above exhibits, under seal to protect the identity of certain City of Mount Vernon staff members who, we submit, have been subject to improper attention and harassment by the plaintiff. We are concerned that filing the opposition and the exhibits publicly will expose these officials to further unnecessary attention. We also believe filing everything under seal will protect the plaintiff.

We emailed Mr. Fecteau concerning this application. He does not consent.

Respectfully submitted,

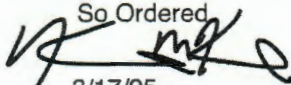
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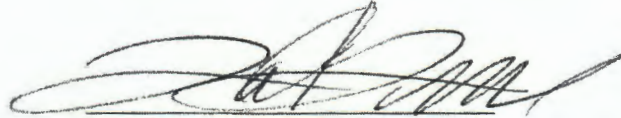
Application is granted. In light of some of the comments from Plaintiff, the Court finds that the safety interests outweigh the First Amendment and common law rights of access to the filings.

So Ordered



3/17/25

THE QUINN LAW FIRM PLLC  
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cc: All counsel of record via ECF